

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Civil Division**

<b>ADELINA C. ROCABRUNA, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.: 1:12-cv-506-LMB/TCB</b>
	)	
<b>BANK OF AMERICA, N.A.,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**PLAINTIFFS' MOTION TO COMPEL DEPOSITIONS AND WRITTEN DISCOVERY**

COMES NOW the Plaintiffs, ADELINA C. ROCABRUNA and MIGUEL A.

ROCABRUNA, by counsel, and hereby moves this Court to grant the following relief:

1. Extend the time for Plaintiffs to complete discovery of Bank of America, N.A. ("BOA" or "Defendant") evidence from October 18, 2012 to November 8, 2012;
2. Provide a three week extension to the deadline for Plaintiffs' Rule 26(a)(3) disclosures;
3. Overrule all Defendant's discovery objections;
4. Compel BOA to produce its Rule 30(b)(6) designee(s) without objection;
5. Compel BOA to produce for depositions the following witnesses, for which it has not provided contact information by which to serve a deposition notice upon the witnesses: Janet Cleversy and Urshay Hill, ACDV operators, and the person most responsible for the management of the Indian ACDV facility; and
6. Compel the Defendant to produce documents and respond to written discovery without limitation.

In support of their Motion, the Plaintiffs' supply the accompanying Memorandum in Support.

Respectfully submitted,  
ADELINA AND MIGUEL ROCABRUNA

By \_\_\_\_\_/s/\_\_\_\_\_  
Of Counsel

Kristi C. Kelly, Esq., VSB #72791  
Andrew J. Guzzo, Esq., VSB # 82170  
SUROVELL ISAACS PETERSEN & LEVY PLC  
4010 University Drive, 2nd Floor  
Fairfax, VA 22030  
Telephone: (703) 277-9774  
Facsimile: (703) 591-9285  
Email: kkelly@sipfirm.com  
Email: aguzzo@sipfirm.com

Leonard A. Bennett, VSB # 37523  
Susan M. Rotkis, VSB # 40693  
CONSUMER LITIGATION ASSOC., P.C.  
763 J. Clyde Morris Blvd., Suite 1A  
Newport News, Virginia 23601  
Telephone: (757) 930-3660  
Facsimile: (757) 930-3662  
Email: lenbennett@clalegal.com  
Email: srotkis@clalegal.com  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been filed in the CM/ECF system, which shall electronically forward it to the following on this 28<sup>th</sup> day of September, 2012, as follows:

Anand Vijay Ramana  
McGuire Woods, LLP  
2001 K Street NW  
Suite 400  
Washington, DC 20006-1040  
E-mail: [aramana@mcguirewoods.com](mailto:aramana@mcguirewoods.com)

Brian Emory Pumphrey  
McGuireWoods LLP  
901 E Cary St  
Richmond, VA 23219-4030  
Email: [bpumphrey@mcguirewoods.com](mailto:bpumphrey@mcguirewoods.com)

\_\_\_\_\_/s/  
Kristi C. Kelly, Esq.,  
Virginia State Bar No. 72791  
SUROVELL ISAACS PETERSEN & LEVY PLC  
4010 University Drive, 2nd Floor  
Fairfax, VA 22030  
Telephone: (703) 277-9774  
Facsimile: (703) 591-9285  
Email: [kkelly@sipfirm.com](mailto:kkelly@sipfirm.com)  
*Counsel for Plaintiffs*